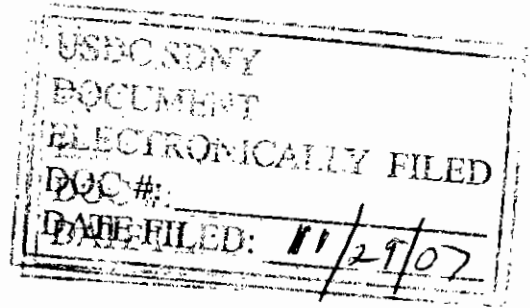




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November 28, 2007

**VIA FAX**

Honorable Michael H. Dolinger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Zhao v. The City of New York et al., 07 CV 3636 (LAK) (MHD)

Your Honor:

In compliance with the Court's Order dated November 21, 2007, defendants will produce to plaintiff the documents bearing bates stamp nos. In Cam 2-11, 21-36, 122-129, and 132-134, which were previously submitted to the Court for in camera inspection. However, we seek the Court's permission to produce the documents subject to certain redactions. In particular, defendants seek permission to redact two references on the document bearing bates stamp no. In Cam 127. The referenced document and the proposed redaction is attached hereto and marked "Confidential" for the Court's convenience. However, In Cam 127 is provided in redacted form to plaintiff's counsel for purposes of preserving assertions of privilege pending the Court's ruling on this application. The objectionable term is related to integrity checks conducted by the NYPD in response to certain allegations of police misconduct. Disclosure of this information will reveal law enforcement techniques and will compromise the ability of the NYPD to monitor claims of police misconduct. The limited redactions proposed by defendants balances the needs of the NYPD against the need of plaintiff to obtain discovery.

In light of the sensitive and confidential nature of these documents, defendants request an Order of the Court directing plaintiff's counsel to keep as confidential and for "attorney's-eyes-only" the documents bearing bates stamp nos. In cam 2-11, 21-36, 122-129, and 132-134.

ENDORSED ORDER

Defendants' request for leave to redact two words is entirely unexplained and mystifying. Nonetheless, to preserve whatever rights in confidentiality that defendants may have, we authorize them to temporarily make the requested redactions, provided that they supply an affidavit within 48 hours by a person with personal knowledge justifying the redactions on some cognizable basis.

*Refused*  
11/28/07